

EXHIBIT “A”
(House Defendants’ Amended Privilege Log)

House Defendants' Amended Privilege Log
Produced April 1, 2022

Control Number	Date	Record Type	Email From	Email To	Email CC	Email BCC	Document Title	Privilege Type	Privilege Description
REL00011642	11/9/2021	Email	Emma Dean	Neal Collins			FW: PRIVILEGED & CONFIDENTIAL - Talking Points and Primer	Attorney-Client Communication	Communication from staff counsel to legislator client forwarding legal advice and attorney work product in advance of redistricting hearing.
REL00011642.0001	11/9/2021	Attach					11.9.2021 Meeting Talking Points.pdf	Work Product	Attorney work product containing mental impressions, opinions, and legal advice for legislator clients.
REL00011642.0002	11/9/2021	Attach					11.9.2021 Law Primer.pdf	Work Product	Attorney work product containing mental impressions, opinions, and legal advice for legislator clients.
REL00011643	11/9/2021	Email	Emma Dean	Jason Elliot			FW: PRIVILEGED & CONFIDENTIAL - Talking Points and Primer	Attorney-Client Communication	Communication from staff counsel to legislator client forwarding legal advice and attorney work product in advance of redistricting hearing.
REL00011643.0001	11/9/2021	Attach					11.9.2021 Meeting Talking Points.pdf	Work Product	Attorney work product containing mental impressions, opinions, and legal advice for legislator clients.
REL00011643.0002	11/9/2021	Attach					11.9.2021 Law Primer.pdf	Work Product	Attorney work product containing mental impressions, opinions, and legal advice for legislator clients.
REL00011644	11/9/2021	Email	Emma Dean	Weston Newton			FW: PRIVILEGED & CONFIDENTIAL - Talking Points and Primer	Attorney-Client Communication	Communication from staff counsel to legislator client forwarding legal advice and attorney work product in advance of redistricting hearing.
REL00011644.0001	11/9/2021	Attach					11.9.2021 Meeting Talking Points.pdf	Work Product	Attorney work product containing mental impressions, opinions, and legal advice for legislator clients.
REL00011644.0002	11/9/2021	Attach					11.9.2021 Law Primer.pdf	Work Product	Attorney work product containing mental impressions, opinions, and legal advice for legislator clients.
REL00011645	11/10/2021	Email	Emma Dean	Jason Elliot			FW: Privileged and Confidential - Public Submissions	Attorney-Client Communication	Communication from staff counsel to legislator client forwarding legal advice and attorney work product in advance of public hearings.
REL00011645.0001	11/10/2021	Attach					LOI WV Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011645.0002	11/10/2021	Attach					Michael Roberts Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011645.0003	11/10/2021	Attach					NAACP Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.

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REL00011645.0004	11/10/2021	Attach							Erica Sampson Map (HD-4).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011645.0005	11/10/2021	Attach							Jeni Atchley (HD-5).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011645.0006	11/10/2021	Attach							John Kraljevich (HD-6).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011645.0007	11/10/2021	Attach							Kevin Eckert Map (HD-7).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011645.0008	11/10/2021	Attach							Statistical Comparison.pdf	Work Product	Confidential document created in anticipation of litigation by attorney summarizing public submissions with attorney mental impressions and opinions.
REL00011646	11/10/2021	Email	Emma Dean	Neal Collins					FW: Privileged and Confidential - Public Submissions	Attorney-Client Communication	Communication from staff counsel to legislator client forwarding legal advice and attorney work product in advance of public hearings.
REL00011645.0001	11/10/2021	Attach							LOWV Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011645.0002	11/10/2021	Attach							Michael Roberts Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011645.0003	11/10/2021	Attach							NAACP Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011646.0004	11/10/2021	Attach							Erica Sampson Map (HD-4).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011646.0005	11/10/2021	Attach							Jeni Atchley (HD-5).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011646.0006	11/10/2021	Attach							John Kraljevich (HD-6).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.

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REL00011646.0007	11/10/2021	Attach						Kevin Eckert Map (HD-7).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011646.0008	11/10/2021	Attach						Statistical Comparison.pdf	Work Product	Confidential document created in anticipation of litigation by attorney summarizing public submissions with attorney mental impressions and opinions.
REL00011647	11/10/2021	Email	Emma Dean	Weston Newton				Privileged and Confidential - Public Submissions	Work Product	Communication from staff counsel to legislator client forwarding legal advice and attorney work product in advance of public hearings.
REL00011647.0001	11/10/2021	Attach						Statistical Comparison.pdf	Work Product	Confidential document created in anticipation of litigation by attorney summarizing public submissions with attorney mental impressions and opinions.
REL00011647.0002	11/10/2021	Attach						Michael Roberts Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011647.0003	11/10/2021	Attach						NAACP Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011647.0004	11/10/2021	Attach						Erica Sampson Map (HD-4).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
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REL00011647.0007	11/10/2021	Attach						Kevin Eckert Map (HD-7).PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011647.0008	11/10/2021	Attach						LOWV Map.PNG	Work Product	Confidential image of publicly submitted maps created by attorney with overlays to convey legal advice in preparation of litigation.
REL00011661	9/3/2021	Email	Emma Dean	Chris Murphy				Attorney Communication Privileged	Attorney-Client Communication	Communication from staff counsel to legislator client with draft work product response for client review.

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REL00011661.0003	9/3/2021	Attach						Draft Letter from Ch. Murphy 9.3.21.docx	Work Product	Draft work product response for client review. Communication from staff counsel to legislator client with draft work product response for client review.
REL00011667	9/27/2021	Email	Emma Dean	Jay Jordan				Sept 28 contact talking points	Attorney-Client Communication	Attorney's mental impressions/opinions provided to client in preparation for meeting.
REL00011667.0001	9/27/2021	Attach						Sept 28 contact talking points.docx	Work Product	Communication from staff counsel to legislator client with draft work product response for review.
REL00011670	10/8/2021	Email	Emma Dean	Chris Murphy				Atty client communication Proposed Response to September Letter.DOCX	Attorney-Client Communication	Draft work product response for client review.
REL00011670.0001	10/8/2021	Attach							Work Product	Communication from staff counsel to legislator client with draft work product response for review.
REL00021323	9/3/2021	Email	Emma Dean	Chris Murphy				Attorney Communication Privileged	Attorney-Client Communication	Draft work product response for client review.
REL00021323.0003	9/3/2021	Attach						Draft Letter from Ch. Murphy 9.3.21.docx	Work Product	Communication from staff counsel to legislator client with draft work product response for review.
REL00020087	11/15/2021	Email	Beth Bernstein	Emma Dean; Patricia Henegan; Justin Bamberg; Wallace Jordan; Weston Newton	Jimmy Hinson; Roland Franklin; Linda Anderson; Neal Collins; Jason Elliot			Redistricting	Attorney-Client Communication	Communication from legislator client to staff counsel regarding draft document.
REL00020355	9/24/2021	Email	Chris Murphy	Emma Dean				Re: Updated draft	Attorney-Client Communication	Communication between staff counsel to legislator client conveying legal advice, mental impressions, and opinions regarding legislative procedure.
REL00028185	9/21/2021	Email	Patrick Dennis	Jay Lucas; Patrick Dennis; Haley Mottel				Sine Die Adjournment	Attorney-Client Communication; Work Product	Communication between staff counsel to legislator client conveying legal advice, mental impressions, and opinions regarding legislative procedure.
REL00028205	9/28/2021	Email	Patrick Dennis	Rep. Bill Taylor				Fwd: Sine Die Adjournment	Attorney-Client Communication; Work Product	Communication between staff counsel to legislator client conveying legal advice, mental impressions, and opinions regarding legislative procedure.
REL00028206	9/28/2021	Email	Patrick Dennis	Rep. Bill Taylor				FW: Sine Die Adjournment	Attorney-Client Communication; Work Product	Communication between staff counsel to legislator client conveying legal advice, mental impressions, and opinions regarding legislative procedure.
REL00028277	10/15/2021	Email	Patrick Dennis	Nicolette Walters				RE: Zak Koeske Qs	Work Product	Communication from staff counsel to staff with attorney's mental impressions and opinions for media inquiry.
REL00028278	10/15/2021	Email	Patrick Dennis	Haley Mottel				FW: Zak Koeske Qs	Work Product	Communication from staff counsel to staff with attorney's mental impressions and opinions for media inquiry.
REL00028413	11/17/2021	Email	Patrick Dennis	Charles Reid				RE: Speaker Lucas Calling the House into Statewide Session Beginning 2:00 pm, Wednesday, December 1, 2021	Work Product	Communication between staff counsel with draft email language asking for attorney's mental impressions and opinion regarding legislative procedure.
REL00028439	11/23/2021	Email	Patrick Dennis	Ashley Harwell-Beach; Charles Reid				RE: Rules Committee - Special Order Redistricting	Work Product	Communication between staff counsel with attorney impressions and opinions on legislative process.

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REL00028440	11/23/2021	Email	Patrick Dennis	Charles Reid; Ashley Harwell-Beach			RE: Rules Committee - Special Order Redistricting	Work Product	Communication between staff counsel with attorney impressions and opinions on legislative process.
REL00033189	10/14/2021	Email	Roland Franklin	Chip Huggins			Census Numbers	Attorney-Client Communication	Communication from staff counsel to legislator client to follow up on question about legal rights.